

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MICHAEL J. BYNUM and CANADA	§	
HOCKEY LLC d/b/a EPIC SPORTS,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Cause No. 4:17-cv-00181
	§	
BRAD MARQUARDT, in his individual capacity	§	
<i>Defendant.</i>	§	

STIPULATION REGARDING INITIAL DISCLOSURES

The parties give notice that they have agreed to extend the deadline to exchange initial disclosures.

In the Joint Discovery/Case Management Plan, filed May 26, 2017 (Dkt. No. 37), the parties noted their agreement to exchange initial disclosures within 30 days of the filing of answers to the complaint. Defendant Marquardt filed his answer on April 12, 2019 (Dkt. No. 97).

The parties have conferred on this matter, and agreed to extend the time to exchange initial disclosures by 30 days, up to and including June 12, 2019.

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

JEFFREY C. MATEER
First Assistant Attorney General

DARREN L. MCCARTY
Deputy First Assistant Attorney General

JOSHUA R. GODBEY
Division Chief
Financial Litigation and Charitable Trusts Division

/s/ H. Melissa Mather
H. Melissa Mather
Assistant Attorney General
Financial Litigation and Charitable Trusts Division
P.O. Box 12548
Austin, TX 78711-2548
Telephone: (512) 475-2540
Facsimile: (512) 477-2348
Email: melissa.mather@oag.texas.gov

Counsel for Brad Marquardt

/s/ Tim Johnson
Locke Lord LLP
Tim Johnson
S.D. Tex. No. 89
State Bar No. 10797650
tjohnson@lockelord.com
600 Travis Street, Suite 2800
Houston, Texas 77002
(713) 226-1200 (Telephone)
(713) 223-3717 (Facsimile)

**ATTORNEY-IN-CHARGE FOR
PLAINTIFFS MICHAEL J. BYNUM and
CANADA HOCKEY LLC d/b/a EPIC SPORTS**

OF COUNSEL:

LOCKE LORD LLP
W. Scott Hastings
S.D. Tex. No. 29932
State Bar No. 24002241
shasting@lockelord.com
2200 Ross Ave., Suite 2800

Dallas, Texas 75201
(214) 740-8000 (Telephone)
(214) 740-8800 (Facsimile)

Nicholas P. Dickerson
S.D. Tex. ID No. 1122160
Texas State Bar No. 24068560
ndickerson@lockelord.com
600 Travis Street, Suite 2800
Houston, Texas 77002
(713) 226-1200 (Telephone)
(713) 223-3717 (Facsimile)

Owen McGovern
State Bar No. 24092804
omcgovern@beckredden.com
1221 McKinney St., Suite 4500
Houston, Texas 77010-2010
Phone: (713) 951-3700
Fax: (713) 951-3720

BECK REDDEN LLP

Joe W. Redden, Jr.
S.D. Tex. No. 2139
State Bar No. 16660600
jredden@beckredden.com

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2019, a true and correct copy of the foregoing Stipulation Regarding Initial Disclosures was electronically served through the CM/ECF system on all counsel of record.

/s/ H. Melissa Mather
H. Melissa Mather
Assistant Attorney General